

Comment on TM-06-06PR
May 4, 2006

Dear NOP,

My husband and I own and operate a 45 cow certified organic dairy in southern VT. We have been on an organic truck since December of 2004. The higher, stable organic price has made all the difference in the world to us and our farm. As a relatively small hill farm we struggled to stay solvent in the conventional milk world. If the organic market hadn't come in when it did, we would be out of business by now. Instead, our bills are paid, two of our three teenage sons are very interested in farming, and we are more optimistic about our future than we have ever been.

However, the news that the NOP did not close the loophole that allows organic dairy producers to continually transition in replacements to already certified herds sheds a dark shadow over the future of organic dairy-ours and every other family operation that organic has provided with this huge opportunity.

This spring we have 12 started calves on milk. Each calf is fed 2 gallons of milk a day for between 7 to 10 weeks of age. At a \$29/cwt milk price that is almost \$300 per calf to weaning. The same calf fed conventional milk at a \$13/cwt milk price would only cost \$130 and probably less than that if less milk was fed or a milk replacer was fed instead. Up until a year old the conventional heifers could be fed cheaper feed and receive growth enhancers (coccidiostats) and antibiotics if the need be. Then at a year old they come onto an organic farm, eat organically for a year, and presto they're organic???? What ever happened to the "once only" whole herd transition? Are these replacement animals so important to these farms because they want to expand, or because their cull rates are so high they can't maintain numbers and therefore can't grow from within?

On our farm the cull rate has dropped substantially over the past few years. Our cows are healthier now and living longer productive lives. We anticipate being to sell some heifers as early as next fall. This will provide us with additional income to pay down debt and get ahead. However, we are concerned that the certified organic heifers we hope to sell next fall won't command a fair price if folks can do the one year transition of conventional yearlings cheaper.

No doubt there is a shortage of organic milk. But at the same time there are a lot of farms in the process of transitioning and the supply is going to grow. Organic dairy is a fantastic opportunity for the family farmer in many parts of this country. We need our farmers. We need the great kids

they raise. We need healthy rural communities and small towns. To be sustainable farming needs to be profitable, it needs to be fun and rewarding, and the young people have to want to stay on and continue.

We need to do all that we can to protect the integrity of the organic rule and the lives of all the hard working, committed people that are out in the barns and in the fields and pastures everyday abiding by that rule, producing clean, healthy, organic food and living the good life it in turn provides for them.

Please reconsider the rule and change it so that all organic replacements have to be out of organic cows at least form the last third of gestation.

Sincerely,
Mary Ellen & David Franklin
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